

Decision \_\_\_\_\_

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Application of SAN DIEGO GAS & ELECTRIC COMPANY (U902M) for Approval of its Energy Storage Procurement Framework and Program As Required by Decision 13-10-040.

And Related Matters.

Application 14-02-006  
(February 28, 2014)

Application 14-02-007  
Application 14-02-009

**DECISION AWARDING COMPENSATION TO GREEN POWER INSTITUTE FOR  
SUBSTANTIAL CONTRIBUTION TO DECISION 14-10-045**

<b>Intervenor: Green Power Institute</b>	<b>For contribution to Decision (D.) 14-10-045</b>
<b>Claimed: \$46,392.00</b>	<b>Awarded: \$46,391.50</b>
<b>Assigned Commissioner: Carla J. Peterman</b>	<b>Assigned ALJ: Colette E. Kersten</b>

**PART I: PROCEDURAL ISSUES**

<b>A. Brief description of Decision:</b>	The Decision approves the energy storage procurement framework and program applications for the 2014-2016 biennial procurement cycle for the three IOUs.
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**B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:**

	<b>Intervenor</b>	<b>CPUC Verified</b>
<b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b>		
1. Date of Prehearing Conference (PHC):	May 14, 2014	Verified
2. Other specified date for NOI:		
3. Date NOI filed:	June 3, 2014	Verified
4. Was the NOI timely filed?		Yes

Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	A.14-04-014	Verified
6. Date of ALJ ruling:	September 26, 2014	Verified
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer or customer-related status?		Yes
Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	A.14-04-014	Verified
10. Date of ALJ ruling:	September 26, 2014	Verified
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.14-10-040	Verified
14. Date of issuance of Final Order or Decision:	October 22, 2014	Verified
15. File date of compensation request:	December 22, 2014	Verified
16. Was the request for compensation timely?		Yes

## PART II: SUBSTANTIAL CONTRIBUTION

### A. Did the Intervenor substantially contribute to the final decision (*see* § 1802(i), § 1803(a), and D.98-04-059).

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<b>D.14-10-045, Decision Approving IOU Storage Procurement Framework and Program Applications</b>	(Please note that Attachment 2 includes a list of GPI Pleadings relevant to this Claim.)	
<b>1. Cost Recovery Methodology (PCIA)</b> The Commission agreed with our comments that the PCIA was an appropriate mechanism for energy storage and the Decision authorized use of the PCIA mechanism to recover	“GPI feels that it is reasonable to include energy storage contracts in the PCIA for the standard ten-year term and is not opposed to granting an exception for longer-term storage contracts, as PG&E suggests.” [GPI Comments, 6/12/14, pg. 4.] “GPI is not clear why the phrase “above	Verified

<p>above-market costs associated with DA and other departing load for energy storage projects procured for bundled service. The Decision also agreed with us that the PCIA should be authorized for contracts up to 10 years.</p> <p>The Commission did not address our request for clarification about why “above-market” costs were being discussed since the law is clear that there can’t be above-market costs associated with energy storage procured pursuant to AB 2514.</p>	<p>market” is included in the question, because AB 2145 requires that any energy storage contracts that are entered into be cost-effective and thus not “above market.” We urge the Commission to clarify this point.” [GPI Comments, 6/12/14, pg. 4]</p> <p>“For the purpose of the first solicitation, we authorize the use of the PCIA mechanism to recover above-market costs associated with DA and other departing load for energy storage projects procured for bundled service, subject to Commission approval.” [Decision D.14-10-045, pg. 46.]</p>	
<p><b>2. Cost Allocation Mechanism (CAM)</b></p> <p>The GPI argued that the CAM is not the appropriate place for the utilities to seek cost recovery for the storage systems procured subject to these Applications. The Commission agreed that CAM is out of scope of this proceeding.</p>	<p>“We appreciate TURN’s clarifications on this issue and we revise our opening comments to mirror TURN’s recommendation: GPI now recognizes that the CAM is not appropriate at this time.” [GPI Reply Comments, 6/19/14, pg. 4.]</p> <p>We concur with SCE [and GPI] and clarify that CAM authorization is out of scope of this proceeding. [Decision D.14-10-045, pg. 47.]</p>	Verified
<p><b>3. Definition and Eligibility Rules</b></p> <p>The GPI made a substantial contribution to the Decision in the area of definition of eligible storage systems in providing the rationale and detail for specifying what parts of an integrated generator-storage operation are eligible to be counted toward an IOU’s storage-procurement obligation. We argued that the</p>	<p>“PG&amp;E argues in its prepared testimony (PG&amp;E Prepared Testimony, p. 2-3) that 2.52 MW of existing dairy biogas contracts should count toward its procurement target. This is a very strained interpretation of energy storage, biogas is never referred to as “energy storage” by the industry, there is no indication that the Commission intended biogas to count as energy storage in previous decisions, and the Commission should accordingly reject PG&amp;E’s argument. Moreover, biogas projects fail</p>	Verified

<p>biogas systems proposed for eligibility by PG&amp;E were in fact not eligible to be counted as storage. The Commission agreed with us, and determined that the biogas projects that PG&amp;E argued should be counted towards its storage-procurement requirements were, in fact, not eligible to be counted as storage.</p>	<p>to meet the section 2835(a) definition of “energy storage system” that PG&amp;E itself cites in its testimony. Last, the Legislature recently created a biomass procurement program under SB 1122, indicating that it knows how to single out and incentivize biomass when it wants to. Biogas is a type of biomass. AB 2514 singled out energy storage and does not mention biogas or biomass, and nor does the Commission do so in its interpretation of the legislation. The Commission should reject PG&amp;E’s argument to include biogas as a type of energy storage.” [GPI Protest, 4/14/14, pg. 6.]</p> <p>The GPI provides a detailed explanation of the difference between generation and storage, including examples, in our Opening Comments. [GPI Comments, 6/12/14, pgs. 9-12.]</p> <p>“PG&amp;E argues again that its proposed dairy biogas projects should count toward its storage procurement targets: “[The] dairy biogas conversion and transport process should be counted as energy storage.” (PG&amp;E opening comments, p. 6). As GPI described in our opening comments, biogas projects should only be counted as energy storage inasmuch as these projects are able to produce and store biogas for later generation, above and beyond the normal operation of the facility. As such, we feel that PG&amp;E is going too far in its recommendation above. It is not the biogas conversion and transport process that should be counted; rather, it is only the capacity to store biogas for generation independently of normal operation. We also recommend that the ability of a biogas facility to produce power from stored biogas should only count toward storage procurement targets in proportion to the hours of the</p>	
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	<p>year that the stored biogas contributes to additional power production. In other words, the stored biogas should be pro-rated in terms of megawatts, based on the stored biogas hours of power production per year. If a biogas facility can store biogas sufficient to run the facility 10% beyond its normally planned operation, for a 1 MW biogas generation facility this would translate into 0.1 MW of energy storage in terms of meeting the procurement mandate.” [GPI Reply Comments, 6/19/14, pg. 7.]</p> <p>“In this decision, we conclude that a qualifying storage component included with a dairy, agricultural, or food waste biogas project, as described by AECA and GPI, is eligible to be counted toward the targets. However, we find that the “natural gas pipeline” does not qualify as the storage component of a biogas project. If PG&amp;E is unable to identify a suitable storage component in the contracted biogas projects, then PG&amp;E cannot claim credit for these projects against the targets.” [Decision D.14-10-045, pg. 62.]</p>	
<p><b>4. Evaluation Protocols</b></p> <p>The GPI was concerned that the utilities were not sufficiently embracing the CEP, as required by the Commission in D.13-10-040, the Decision establishing the procurement program for energy-storage systems. We emphasized the need for the utilities to “draw on” the CEP in analyzing and ranking projects, and the Decision instructs the utilities to do just that.</p>	<p>“GPI is very concerned about these statements from PG&amp;E and similar statements by the other IOUs. It seems to GPI that the IOUs essentially plan to go through the motions with the CEP and then use their own evaluation protocols to evaluate and select bids. This is contrary to the clear intent of the Commission in D.13-10-040, which requires the IOUs to “draw on” the CEP in evaluating and selecting bids, <u>and we strongly urge the Commission to reaffirm its intent that the CEP be used proactively and consistently by the IOUs in evaluating and selecting bids.</u>” [GPI Protest, 4/14/14, pgs. 8-9, underlining in the original.]</p>	Verified

	<p>“Again, we strongly urge the Commission to be proactive and ensure that the IOUs use a strong CEP to evaluate and select bids, at the very least as a required complement to the IOUs own preferred evaluation methodologies, as described in Appendix A to the Decision (D.13-10-040).” [GPI Protest, 4/14/14, pg. 10.]</p> <p>“PG&amp;E and the other IOUs shall “draw on” the CEP to evaluate bids. We agree that the Commission intended to provide each IOU discretion to also use its own proprietary evaluation protocol in evaluating bids. However, this does not mean that the CEP can be ignored in bid evaluation. To the contrary, the Commission was clear that it must be used in addition to each IOU’s proprietary protocol.” [GPI Comments, 6/12/14, pg. 14.]</p> <p>“GPI urges parties to “draw on” CEP to evaluate bids. It wants to ensure that the Commission is “proactive” and use a strong CEP to evaluate and select bids. ... We acknowledge that D.13-10-040 gives IOUs wide latitude to use proprietary protocols for actual project selection and collaborate with ED to establish the CEP, while ensuring that the protocols “draw on” the range of cost and benefits identified in the OIR/studies.” [Decision D.14-10-045, pg. 69.]</p>	
<p><b>5. Procurement Requirements</b></p> <p>The GPI provided a series of detailed suggestions for improvements to the proposed solicitation documents of the IOUs, which the Decision acknowledges. The Decision</p>	<p>“The IOU RFO documents contain a number of provisions that are too broad in their claims. We itemize concerns about each IOU’s document below.” [GPI Comments, 6/12/14, pg. 15, see pgs. 15-19 for the detailed recommendations made by GPI.]</p> <p>“Several parties, including GPI, CESA,</p>	Verified

provides broad discretion to the IOUs in structuring their documents, while encouraging them to seriously consider our suggestions.	and Calpine, offer some constructive suggestions to enhance RFO requirements.” [Decision D.14-10-045, pg. 74.]	
<p><b>6. Contract Standardization</b></p> <p>While the Commission did not take our recommendation to order the three utilities to offer a common pro forma, the Decision does embrace the concept of standardization, and offers to revisit “if and when a more streamlined contract form is appropriate.” Moreover, even though the GPI’s recommendation was not fully accepted, it certainly contributed to the record upon which the decision was founded, and based on the Discussion in the Decision it was given serious consideration in the Commission’s deliberative process. Thus, our efforts on this topic made a substantial contribution to the Decision.</p>	<p>“GPI feels that the pro forma Energy Storage Agreement (“ESA”) supplied by each utility should be more standardized. We urge the Commission to work with the IOUs to make the PG&amp;E pro forma the common basis for pro formas for all three IOUs. Analyzing, revising and negotiating changes to pro formas can consume a large amount of time and funding for developers and IOUs alike, acting as a significant barrier to participation for smaller developers. Accordingly, GPI supports a standardized pro forma approach.” [GPI Comments, 6/12/14, pg. 5.]</p> <p>“PG&amp;E provides a pro forma agreement as a starting point for negotiations between the parties. GPI in general has no problem with the PG&amp;E pro forma. We urge the Commission to make the PG&amp;E pro forma the common basis for pro formas for all three IOUs. Analyzing, revising and negotiating changes to pro formas can consume a large amount of time and funding for developers and IOUs alike. Accordingly, GPI supports a standardized pro forma approach. We recognize the need for some flexibility across IOUs to take into account the differences between each IOU. However, the large majority of the pro forma language could and should be common across all three IOUs.” [GPI Comments, 6/12/14, pg. 17.]</p> <p>“We feel that it is important to start this major new procurement process</p>	Verified

	<p>correctly, and a standardized baseline pro forma is an important ingredient in “getting it right” because of the intrinsic and pronounced asymmetry in negotiating power between the shortlisted developer and the IOU.” [GPI Reply Comments, 6/19/14, pg. 3.]</p> <p>“Consistent with guidance provided in D.13-10-040, we do not require IOUs to develop standard contracts at this time. For the time being, we allow illustrative “starting points” that can be used as a basis to negotiate favorable terms for both buyers and sellers. Through such an iterative or “give and take” process, business lessons can be learned and applied to future biennial cycles. As the market matures, and technologies and use cases are further defined, we can revisit if and when a more streamlined contract form is appropriate.” [Decision D.14-10-045, pg. 82.]</p>	<p>Pages 2 and 3.</p> <p>Pages 82 and 83.</p>
<p><b>7. Interconnection Requirements</b></p> <p>Similar to the issue of Contract Stabilization, the Commission did not adopt our recommendation to order the three utilities to offer standardized interconnection requirements. However, the Decision does embrace the concept of standardization: “Over time, with the benefit of more experience in the storage markets, there may likely be more incentives to standardize interconnection requirements that benefit buyers and sellers, and the industry at large.” Moreover, even though the GPI’s recommendation was not fully embraced for the first</p>	<p>“We urge the Commission to standardize PG&amp;E’s pre-bid interconnection requirements across all three utilities. PG&amp;E requires only that an interconnection application be submitted prior to contract execution, whereas SCE is seeking a Phase 1 study or its equivalent before a final offer is submitted. Given the time and expense required for a Phase 1 study, which will effectively screen out all but the largest companies seeking to make bids, we strongly prefer PG&amp;E’s approach.” [GPI Comments, 6/12/14, pg. 2.]</p> <p>“Pertaining to this first solicitation cycle, we agree with the IOUs that it is counterproductive at this time in the solicitation to adopt uniform interconnection standards across utilities. ... Over time, with the benefit of more experience in the storage</p>	<p>Verified</p>



round of storage solicitations, it certainly contributed to the record on which the decision was founded, and based on the Discussion in the Decision it was given serious consideration in the Commission's deliberative process. Thus, our efforts on this topic made a substantial contribution to the Decision.	markets, there may likely be more incentives to standardize interconnection requirements that benefit buyers and sellers, and the industry at large." [Decision D.14-10-045, pg. 96.]	
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**B. Duplication of Effort (§ 1801.3(f) and § 1802.5):**

	<b>Intervenor's Assertion</b>	<b>CPUC Discussion</b>
<b>a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?</b> <sup>1</sup>	Yes	Yes
<b>b. Were there other parties to the proceeding with positions similar to yours?</b>	Yes	Yes
<b>c. If so, provide name of other parties:</b> ORA, TURN, Sierra Club, NRDC, EDF, California Energy Storage Alliance, Large-Scale Solar Assoc., IEP, and the three large IOUs.		Yes
<b>d. Intervenor's claim of non-duplication:</b>  This proceeding covers a wide variety of topics related to energy storage installations. The Green Power Institute has focused its participation in our primary areas of interest, the use of storage for providing integration services to accommodate renewable energy, and the use of storage to provide carbon-free operating services to the grid. Green Power coordinated its efforts in this proceeding with other parties in order to avoid duplication of effort, and added significantly to the outcome of the Commission's deliberations. Some amount of duplication has occurred in this proceeding on all sides of contentious issues, but Green Power avoided duplication to the extent possible, and tried to minimize it where it was unavoidable.		Yes

<sup>1</sup> The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill No. 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

**PART III: REASONABLENESS OF REQUESTED COMPENSATION****A. General Claim of Reasonableness (§ 1801 and § 1806):**

<b>a. Intervenor's claim of cost reasonableness:</b>	<b><u>CPUC Discussion</u></b>
<p>The GPI is providing, in Attachment 2, a listing of all of the pleadings we provided in this Proceeding, A.14-02-006, that are relevant to matters covered by this Claim, and a detailed breakdown of GPI staff time spent for work performed that was directly related to our substantial contributions to Decision D.14-10-045.</p> <p>The hours claimed herein in support of Decision D.14-10-045 are reasonable given the scope of the Proceeding, and the strong participation by the GPI. GPI staff maintained detailed contemporaneous time records indicating the number of hours devoted to the matters settled by these Decisions in this case. In preparing Attachment 2, Dr. Morris reviewed all of the recorded hours devoted to this proceeding, and included only those that were reasonable and contributory to the underlying tasks. As a result, the GPI submits that all of the hours included in the attachment are reasonable, and should be compensated in full.</p> <p>Dr. Morris is a renewable energy analyst and consultant with more than thirty years of diversified experience and accomplishments in the energy and environmental fields. He is a nationally recognized expert on biomass and renewable energy, climate change and greenhouse-gas emissions analysis, integrated resources planning, and analysis of the environmental impacts of electric power generation. Dr. Morris holds a BA in Natural Science from the University of Pennsylvania, an MSc in Biochemistry from the University of Toronto, and a PhD in Energy and Resources from the University of California, Berkeley.</p> <p>Dr. Morris has been actively involved in electric utility restructuring in California throughout the past two decades. He served as editor and facilitator for the Renewables Working Group to the California Public Utilities Commission in 1996 during the original restructuring effort, consultant to the CEC Renewables Program Committee, consultant to the Governor's Office of Planning and Research on renewable energy policy during the energy crisis years, and has provided expert testimony in a variety of regulatory and legislative proceedings, as well as in civil litigation.</p> <p>Mr. Hunt is a renewable energy law and policy expert with substantial experience in California, in local energy planning and in state energy-policy development. He has worked with local governments throughout</p>	<p>Intervenor's claim of cost reasonableness is accepted.</p>

<p>Southern California, in his current role with Community Renewable Solutions LLC and in his previous role as Energy Program Director for the Community Environmental Council, a well-known non-profit organization based in Santa Barbara. Mr. Hunt was the lead author of the Community Environmental Council's A New Energy Direction, a blueprint for Santa Barbara County to wean itself from fossil fuels by 2030. Mr. Hunt also contributes substantially to state policy, in Sacramento at the Legislature and in San Francisco at the California Public Utilities Commission, in various proceedings related to renewable energy, energy efficiency, community-scale energy projects, and climate change policy. Mr. Hunt is also a Lecturer in Climate Change Law and Policy at UC Santa Barbara's Bren School of Environmental Science &amp; Management (a graduate-level program). He received his law degree from the UCLA School of Law in 2001, where he was chief managing director of the Journal for International Law and Foreign Affairs. Mr. Hunt is a regular columnist at Renewable Energy World</p> <p>Decision D.98-04-059 states, on pgs. 33-34, "Participation must be productive in the sense that the costs of participation should bear a reasonable relationship to the benefits realized through such participation. ... At a minimum, when the benefits are intangible, the customer should present information sufficient to justify a Commission finding that the overall benefits of a customer's participation will exceed a customer's costs." This proceeding was concerned with preparing the market for the first round of sanctioned solicitations for energy-storage systems. Storage systems have the potential to provide integration services and other grid operating services that are completely free of carbon-emissions. If successful, the efforts that have begun in this proceeding have the potential to save ratepayers millions of dollars annually in terms of reduced costs of grid operations. These cost reductions overwhelm the cost of our participation in this proceeding.</p>	
<p><b>b. Reasonableness of hours claimed:</b></p> <p>The GPI made Significant Contributions to Decision D.14-10-045 by participating in working groups, and providing a series of Commission filings on the various topics that were under consideration in the Proceeding, and are covered by this Claim. Attachment 2 provides a detailed breakdown of the hours that were expended in making our Contributions. The hourly rates and costs claimed are reasonable and consistent with awards to other intervenors with comparable experience and expertise. The Commission should grant the GPI's claim in its entirety.</p>	

<b>c. Allocation of hours by issue:</b>		
1. Cost Recovery Methodology	10%	
2. Cost Allocation Mechanism	5%	
3. Definition and Eligibility Rules	20%	
4. Evaluation Protocols	15%	
5. Procurement Requirements	20%	
6. Contract Standardization	15%	
7. Interconnection Requirements	15%	

**B. Specific Claim:\*\***

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
G. Morris	2014	45.50	\$270	See comment 1	\$12,285.00	45.50	\$270	\$12,285.00
T. Hunt	2014	85.75	\$370	See comment 2	\$31,728.00	85.75	\$370	\$31,727.50
Subtotal: \$44,013.00						Subtotal: \$44,012.50		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
G. Morris	2014	15	\$135	½ rate for 2014	\$2,025.00	15	\$135	\$2,025.00
Subtotal: \$2,025.00						Subtotal: \$2,025.00		
COSTS								
#	Item	Detail			Amount	Amount		
	Travel	T. Hunt to SF for Workshop, 6/2/14 (see Attachment 2 for detailed travel expenses)			\$354.00	\$354.00		
Subtotal: \$354.00						Subtotal:\$354.00		
TOTAL REQUEST: \$46,392.00						TOTAL AWARD: \$46,391.50		
<p>**We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer's normal hourly rate.</p>								

ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR <sup>2</sup>	Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation
Tamlyn (Tam) Hunt	January 29, 2002 <sup>3</sup>	218673	No. Please note from January 1, 2005 until April 27, 2009 Hunt was an inactive member of the California State Bar.

**C. Attachments Documenting Specific Claim and Comments on Part III**

Attachment or Comment #	Description/Comment
Comment 1	<p>Dr. Morris’ approved rate for 2012 is \$245/hr (D.13-05-009). We have previously applied for a 2013 rate for Dr. Morris of \$250, which is the 2012 rate with the 2013 COLA of 2% (Res. ALJ-287), with rounding. Res. ALJ-303 provides for a 2014 COLA of 2.58% over 2013 rates. In addition, we are asking for a 5% step increase for Dr. Morris, resulting in a 2014 rate of \$270/hr (<math>250 \times 1.0258 \times 1.05</math>, rounded to the nearest five, per D.13-05-009). Dr. Morris has been actively practicing before the Commission since 2003. This is only the second time that we are requesting a step increase for Dr. Morris. This request is consistent with D.07-01-009 and D.08-04-010.</p> <p>Dr. Morris has been representing the GPI before the Commission since the beginning of 2003, and thus has accumulated more than a decade of experience. He was already a senior-level renewable-energy expert before beginning his work at the Commission. During his almost 12 years of practice before the Commission, Dr. Morris has received one step increase in rate from PUC, in 2009. During his years of practice before the Commission, Dr. Morris has become a respected authority on matters relating to renewable-energy policy issues and greenhouse-gas emissions policy issues, and has made many important contributions to the Commission’s deliberations. Dr. Morris deserves a step increase in his approved PUC rate. The requested rate of \$270 for 2014 leaves Dr. Morris well within the range approved for his experience level. We use this rate in this Request for Award.</p>
Comment 2	<p>Mr. Hunt’s approved rate for 2013 is \$345/hr (D.14-07-024). Res. ALJ-303 provides for a 2014 COLA of 2.58% over 2013 rates. In addition, we are asking for a 5% step increase for Mr. Hunt, resulting in a 2014 rate of \$370/hr (<math>345 \times 1.0258 \times 1.05</math>, rounded</p>

<sup>2</sup> This information may be obtained through the State Bar of California’s website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

<sup>3</sup> GPI listed “Nov. 2001” in this box in its original claim; however, after research on the California State Bar website, we have reflected the correct date in which Tam Hunt was admitted to the California Bar.

	<p>to the nearest five, per D.13-05-009). Mr. Hunt has been an attorney for 13 years and is entering his 14th year of practice in 2015. This request is consistent with D.07-01-009 and D.08-04-010.</p> <p>Mr. Hunt has represented various intervenors before the Commission since 2005 and has been in the renewable energy field for over a decade. Accordingly, the appropriate range for an attorney of his experience is \$315-570. Resolution ALJ-303, which approved the 2014 COLA, states: “It is reasonable to allow individuals an annual ‘step increase’ of 5%, twice within each experience level and capped at the maximum rate for that level, as authorized by D.07-01-009.” Hunt has received no step increase in the 13+ years compensation bracket, his last step increase in the previous bracket was in 2012, and his current rate is at the lower end of the 13+ bracket. Hunt represents the Green Power Institute, the Community Environmental Council and the Clean Coalition at the Commission, reflecting the fact that he has a broad background and deep expertise in many topics before the Commission, including renewable energy policy, energy storage policy, electric vehicle policy, greenhouse gas emission policy, and other areas. Hunt is a well-known member of the California policy-making community and we feel that the requested step increase is appropriate.</p>
Attachment 1	<b>Certificate of Service</b>
Attachment 2	<b>Allocation of effort by issue, list of pleadings, breakdown of hourly efforts</b>

**D. CPUC Disallowances and Adjustments:**

<b>Item</b>	<b>Reason</b>
Gregg Morris’ hourly rate(s).	Morris’ most recent hourly rate adopted by the Commission is \$250 for 2013 by Decision (D.) 15-03-034. We find the above explanation for the application of a 5% step-increase and application of the 2014 COLA, per Resolution ALJ-303, to be reflective of Morris’ years of experience in the energy-renewable field. As such, we adopt the rate of \$270 per hour for work Morris completed in this proceeding in 2014. This rate is effective as of the date this Decision is adopted, and will be applied on Green Power’s pending claims moving forward.
Tam Hunt’s hourly rate(s)	Hunt’s most recent hourly rate adopted by the Commission is \$345 for 2013 by Decision (D.) 14-07-024. We find the above explanation for the application of the 5% step-increase and application of the 2013 COLA, per Resolution ALJ-303, to be reflective of Hunt’s years of experience as an attorney. As such, we adopt the rate of \$370 per hour for work Hunt completed in this proceeding in 2014. This rate is effective as of the date of this Decision is adopted, and will be applied for Hunt’s work on pending claims moving forward.

**PART IV: OPPOSITIONS AND COMMENTS**

<b>A. Opposition: Did any party oppose the Claim?</b>	No
<b>B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?</b>	Yes

**FINDINGS OF FACT**

1. GPI has made a substantial contribution to Decision 14-10-045.
2. The requested hourly rates for GPI's representatives are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$46,391.50.

**CONCLUSION OF LAW**

1. The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.

**ORDER**

1. Green Power Institute is awarded \$46,391.50.
2. Within 30 days of the effective date of this Decision, San Diego Gas & Electric Company, Pacific Gas and Electric Company, and Southern California Edison Company shall pay Green Power Institute the their respective shares of the award, based on their California-jurisdictional electric revenues for the 2014 calendar year, to reflect the year in which the proceeding was primarily litigated. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning March 7, 2015, the 75<sup>th</sup> day after the filing of Green Power Institute's request, and continuing until full payment is made.
3. The comment period for today's decision is waived.

This decision is effective today.

Dated \_\_\_\_\_, 2015, at San Francisco, California.

**APPENDIX****Compensation Decision Summary Information**

<b>Compensation Decision:</b>		<b>Modifies Decision?</b>	No
<b>Contribution Decision(s):</b>	D1410045		
<b>Proceeding(s):</b>	A1402006		
<b>Author:</b>	ALJ Kersten		
<b>Payer(s):</b>	San Diego Gas & Electric Company, Pacific Gas and Electric Company, and Southern California Edison Company		

**Intervenor Information**

<b>Intervenor</b>	<b>Claim Date</b>	<b>Amount Requested</b>	<b>Amount Awarded</b>	<b>Multiplier?</b>	<b>Reason Change/Disallowance</b>
Green Power Institute	12/22/2014	\$46,392.00	\$46,391.50	N/A	

**Advocate Information**

<b>First Name</b>	<b>Last Name</b>	<b>Type</b>	<b>Intervenor</b>	<b>Hourly Fee Requested</b>	<b>Year Hourly Fee Requested</b>	<b>Hourly Fee Adopted</b>
Gregg	Morris	Expert	Green Power Institute	\$270	2014	\$270
Tam	Hunt	Attorney	Green Power Institute	\$370	2014	\$370

**(END OF APPENDIX)**